

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

ANAHEIM GARDENS, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 93-655C
	)	(Judge Tapp)
THE UNITED STATES,	)	
	)	
Defendant.	)	

**JOINT STATUS REPORT**

Pursuant to the Court's December 13, 2023 order (ECF No. 736 at 2), plaintiffs, Anaheim Gardens, *et al.* (specifically, the Second-Wave Plaintiffs (SWPs)), and defendant, the United States, respectfully provide the following joint status report regarding the parties' discovery efforts since the filing of their January 15, 2025 interim joint status report and January 21, 2025 supplemental joint status report.

1. Since the filing of the parties' January 21, 2025 supplemental joint status report, the parties have been preparing to make the expert disclosures due April 24, 2025.
2. Counsel for the United States and counsel for SWPs have been engaged in a review of the deposition testimony and documents produced by plaintiffs and by the United States for purposes of trial preparation.
3. In addition, SWPs and the United States hereby respectfully and jointly propose the following pretrial deadlines based upon this Court's standing order and request that the Court issue an order setting these pretrial deadlines. For frame of reference, the below table also includes deadlines already calendared by the Court, including those set by the Court's February 12, 2025 order. ECF No. 814.

Exchange of affirmative expert reports	April 24, 2025
Status conference set by the Court's February 12, 2025 order	April 29, 2025
Initial meeting of counsel to exchange exhibit and witness lists, identify deposition transcripts, and establish stipulations of agreed facts (90 days before trial)	May 13, 2025
Initial Pre-trial Conference (87 days before trial)	May 16, 2025
Exchange of Witness Lists and Exhibit Lists (84 days before trial)	May 19, 2025
Exchange of Objections to Witness and Exhibit Lists (70 days before trial)	June 2, 2025
Status conference set by the Court's December 17, 2024 order	June 3, 2025
Exchange of rebuttal expert reports	June 9, 2025
Replies to Objections to Exhibit and Witness Lists (56 days before trial)	June 16, 2025
Motions in Limine (49 days before trial)	June 23, 2025
Close of Expert Discovery and Filing of Pretrial Memoranda (42 days before trial)	June 30, 2025
Responses to Motions in Limine (35 days before trial)	July 7, 2025
Replies to Motions in Limine (28 days before trial)	July 14, 2025
Pre-Trial conference set by the Court's December 17, 2024 order	July 15, 2025
Meeting of Counsel	July 18, 2025
Joint Exhibit List, Joint Stipulation of Facts, and Joint Statement of Good Faith (21 days before trial)	July 21, 2025
Order of Witnesses for First Trial Tranche (3 days before trial)	August 8, 2025
Trial begins	August 11, 2025

The proposed pretrial deadlines are those set out in the Court's standing order on chamber rules, ECF No. 794, with two deviations. First, both SWPs' and defendant's pretrial memoranda are due 42 days before trial, which allows for expert discovery to be completed prior to the deadline for SWPs' pretrial memorandum. Second, although the Court's standing order includes a deadline for the filing of the order of witnesses, the parties propose that each party file its order of witnesses for each specific trial tranche three days before trial begins for that specific trial tranche. Thus, the parties would not file the order of witnesses for the second trial tranche until three days before the date set for trial on the second trial tranche and would follow the same procedure for trial on subsequent trial tranches.

4. Lastly, the parties respectfully request that the Court clarify whether the April 29 status conference identified in the Court's February 12 Order, ECF No. 814, effectively vacates the March 3, 2025 status conference from the Court's December 17, 2024 order, ECF No. 802.

Respectfully submitted,

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